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Attorneys for Defendant
Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF BRENT SCHWARZ
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Courtroom: 8
Judge: Hon. William Alsup
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Defendants' Motion for Summary Judgment
2. Proposed Judgment
3. Chang Declaration
4. Brun Declaration

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

1 I, BRENT SCHWARZ, declare:

2 1. I am a Senior Manager of Business Operations at the Advanced Technologies
3 Group at Uber Technologies (“Uber”), assigned to Otto Trucking. I was Senior Business
4 Operations Manager in charge of Self-Driving Trucks at Ottomotto LLC (“Ottomotto”). I am an
5 equity holder in Otto Trucking LLC (“Otto Trucking”) and coordinate operations between Uber
6 and Otto Trucking (and its subsidiaries). I have personal knowledge of the facts stated herein. I
7 make this declaration based on personal knowledge and, if called as a witness, I could and would
8 testify competently to the matters set forth herein. I make this declaration in support of
9 Defendant’s Motion for Summary Judgment.

10 2. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED].

14 [REDACTED] Otto Trucking has a wholly owned subsidiary, Otto Transport LLC. [REDACTED]
15 [REDACTED] (the “Otto
16 Transport Trucks”). [REDACTED]
17 [REDACTED]

18 [REDACTED] Each of the Leased and Otto Transport Trucks [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 5. [REDACTED]
23 [REDACTED]
24 [REDACTED].

25 6. No Leased or Otto Transport Truck has ever been equipped with the Spider or Fuji
26 LiDAR system.

27 7. Neither Otto Trucking nor Otto Transport has ever made, used, sold, offered for
28 sale, or imported into the U.S. either the Spider or Fuji LiDAR system.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 31st day of August, 2017 in San Francisco, California.

3
4 /s/ Brent Schwarz
5 BRENT SCHWARZ

6
7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Brent Schwarz has
10 concurred in this filing.

11 Dated: August 31, 2017

/s/ Michael A. Jacobs
12 MICHAEL A. JACOBS
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